

### Remarks

#### 35 U.S.C. 102

It is noted that the Examiner now rejects all of pending claims 20 to 27, 29 to 31, 33 to 40, 42, 43, and 45 to 47 as being anticipated by Applicant's Admitted Prior Art 'AAPA'. It is somewhat surprising to the Applicant that such a rejection has been formulated at this stage in the examination procedure given that AAPA has previously only been employed in combination with other references to reject claims of generally broader scope under 35 U.S.C. 103. The question arises as to why a rejection under 35 U.S.C. 102 was not previously considered valid against claims of broader scope considered earlier in the examination procedure?

In any event, Applicant respectfully disagrees with the Examiner's characterization of AAPA and denies that it teaches all of the limitations of independent claim 20 or any of the other independent claims as required under 35 U.S.C. 102 to establish a prima facie rejection of anticipation.

Claim 20 as presently pending reads as (with emphasis added):

“A communication system comprising:

    a plurality of virtual private networks 'VPNs' interconnected by a first data network;

    a second data network connected to the plurality of VPNs via the first data network, the second data network using an Internet Protocol 'IP' network addressing scheme that uses different IP addresses to a private IP network addressing scheme used by at least one of said plurality of VPNs; and

a VPN gateway having a VPN media proxy directly interfacing the first data network and the second data network thereby connecting the second data network to the plurality of VPNs via the first data network, the VPN gateway

being shared by said plurality of VPNs and providing a plurality of virtual routing functions, respective ones of said plurality of virtual routing functions being connected to respective ones of said plurality of VPNs such that each virtual routing function has an address in a private IP address space of a respective one of said plurality of VPNs, wherein the VPN media proxy is configured to pass call bearer packets from a source IP address in said at least one of said plurality of VPNs to a destination IP address in said second data network, the VPN media proxy having an IP address translator arranged to translate the destination IP address of the call bearer packets in accordance with the IP network addressing scheme of the second data network, and to send the call bearer packets towards the translated IP destination address in the second data network."

Applicant has underlined in the above wording of claim 20 some of the features of claim 20 that are not taught by AAPA (figures 1 and 2 of the application as filed).

It is quite clear from figures 1 and 2 and the corresponding part of the written description of Applicant's specification that the media proxies 42 of AAPA are located in the second (carrier) data network and not *directly interfacing the first data network and the second data network thereby connecting the second data network to the plurality of VPNs via the first data network*, i.e. at the interface of the first data network to the second data network as required by the claims. Nor do the media proxies 42 of AAPA comprise part of a VPN gateway as required by the claims.

AAPA also does not disclose the limitation of *the VPN gateway being shared by said plurality of VPNs and providing a plurality of virtual routing functions, respective ones of said plurality of virtual routing functions being connected to respective ones of said plurality of VPNs such that each virtual routing function has an address in a private IP address space of a respective one of said plurality of VPNs* as required by the claims. In AAPA, the equipment provided at the interface of the first data network

and the second data network comprises conventional routers and network address translators 'NATs'. This equipment does not comprise a VPN gateway and, more importantly, this equipment does not provide a plurality of virtual routing functions, etc as claimed. AAPA makes no mention of virtual routing functions and one skilled in the art would understand that the routers 48 of AAPA are not employed in the manner defined in the pending claims.

Furthermore, AAPA does not disclose the claim limitation *the VPN media proxy having an IP address translator arranged to translate the destination IP address of the call bearer packets in accordance with the IP network addressing scheme of the second data network* as required by the claims. In AAPA, the NATs are not provided in the media proxies, but are separately located within the network arrangement. The media proxies 42 of AAPA are located in the second data network whereas the NATs 46 are located at a different location in the network, being located at the interface of the first and second data networks. Also, in AAPA, the NATs and media proxies are not both constituent parts of any VPN gateway provided to directly interface the first and second data networks as required by the claims.

At least the foregoing features of claim 20 are not taught by AAPA as is clearly evident from figures 1 and 2 and the part of the description of Applicant's specification relating to AAPA.

The Examiner, in justifying his finding of anticipation of the main claims based on AAPA, identifies figures 1 and 2 of the drawings and various excerpts of the description. Applicant accepts that figures 1 and 2 and the identified excerpts do comprise AAPA, but denies the Examiner's characterization of such figures and excerpts. It is difficult for the Applicant to comprehend the Examiner's finding of anticipation on the grounds asserted when it is clear from AAPA that the media proxies 42 are located in the second data network and thus, for this reason alone, cannot result in the network arrangement as defined by the claims. A simple

comparison of figures 2 and 3 of Applicant's specification provides clear support for Applicant's submission that the claims are novel over AAPA.

For the foregoing reasons, it is respectfully submitted that claim 20 and the other independent claims (claims 30, 39 and 47) are not anticipated by AAPA.

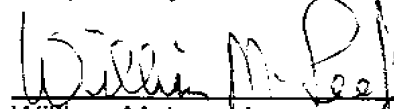
The rejection of the dependent claims as being anticipated by AAPA is moot for at least the reason that these claims depend from claims that are novel over AAPA.

Favorable reconsideration of the claims is solicited.

An appropriate petition for extension of time is also submitted herewith.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Lee, Jr.", is written over a horizontal line.

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